

TO: FEDERAL COMMUNICATION COMMISSION
FROM: Try Safety First / John J. Fischer, CEO
DATE: July 18, 2013

**RE: Comment for Public Service GN Docket No. 13-111
Promoting Technological Solutions to Combat Contraband Wireless Device
Use in Correctional Facilities**

I would like to commend the FCC for issuing Public Service GN Docket No. 13-111 seeking comment on Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities. The information contained herein refers specifically to “Other Technological Solutions.”

The solution presented herewith goes above and beyond that of contraband prison phones. In understanding the solution, it should be noted that prisons are by no means exclusive arenas for societal cell phone problems and the United States is by no means exclusive to the myriad of problems occurring.

It should also be noted the primary reason for the quantum difficulty to correct any of the problems mentioned in this brief is directly attributable to the fact there “currently” does not exist any protocol safety standards among the 650 different makes and models of cell phones. With recent advancements in technology, that no longer needs to be the case.

IMPORTANT NOTE: The solution presented below can correct one or all of the following societal cell phone problems. And if desired, once configured properly, each solution can independently be applied state by state or as a whole across the entire country. This technological solution provides many different options.

Mobile Phone Problems Are Well Documented In The Following Areas:

Prisons - #1 smuggled contraband. Gang warfare and illegal activities are carried out.
Highways - #1 cause of distracted driving accidents and leading killer of teen drivers.
Classrooms - #1 problem in our schools due to class disruption, cheating, and bullying.
Court rooms - jury tampering, jury box research, jury boredom, jury social media.
Airplanes - capable of disrupting the in-flight instrument panel gauges.
High Security - mobile phones are forbidden in many high level intelligence areas.
Hospitals - some areas are restricted to prevent potential equipment malfunction.
Banks - multi-party thieves communicate back and forth.
Movie Theatres - from rude patrons to copy artist pirating.

The following pages will present a new technological advancement for the wireless industry. The advancement is called **Automated Protocol Intelligence (API)** and may effectively create an entire supply chain of solutions for societies across the globe.

Using API, a “Carrier Activation Only” protocol safety chain is built into a look-up table to be uploaded via (FOTA), firmware over the air across all carrier networks. (FCC Condition of License Regulation will be necessary). Once uploaded, every phone will house an optional safety protocol which can be activated according to federal, state or local law.

Carrier Activation Only Protocol Safety Chain – The encrypted look-up table can only be accessed by the carrier, hence the name. It is suggested that it be updated twice yearly via carrier system update for which the carrier is justly compensated (explained in Business Model).

A simple migration period (estimated time to complete: 90-180 days) will bring all phones into regulatory compliance. Once full migration is achieved, a low cost (approx. \$199), low range (1-10 meters) Active Protocol Trigger Device will be available from the Carriers (a second source of revenue).

Full regulatory compliance will properly provide parents, teachers, wardens, judges, pilots, public transportation officials, and business owners an optional tool to finally eliminate their respective wireless problems.

Features and Benefits: Carrier Based; Multi-Solution; Multi-Option; Multi-Gov't; Easy Implementation; Easy Updates; Low Maintenance; Very Low Cost.

**BUILDING A MULTI-LANE BRIDGE TO SAFE CELL PHONE USAGE
AND AUTOMATED ENFORCEMENT OF ENACTED STATE LAWS
(API)**

Smarter, Safer, Courteous,
& Compliant



Automated Protocol Intelligence

A phone will know where it is and how to behave...
thereby creating an entire supply chain of solutions for the wireless industry!

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ADDITIONAL DETAIL AND DESCRIPTION

Try Safety First Automated Protocol Intelligence (API) directs a mobile device's operational behavior in accordance with its location and corresponding federal, state, and local laws, regulations, policies and procedures set forth by the elected officials of that particular locality. This is accomplished using a unique hardware software communication platform which TSF has developed. Below is the TSF acronym key and corresponding flowchart detailing the exact procedures.

TSF ACRONYM KEY FOR API TECHNOLOGY

(flowchart to follow)

TSF - Try Safety First, Inc: Inventor of API technology.

API – Automated Protocol Intelligence: The automated operational procedures of a mobile device functioning according to its current location and the corresponding state laws, regulations, policies and procedures.

MPL – Mobile Protocol Library: The brain of API. Included in the MPL are Mobile Protocol Environments (MPE), Environment Specific Protocols (ESP), and Regulatory (look-up) Table of State Laws (RTS). It will be controlled and updated by the Provider. Once standardized, the MPL will be manufacturer installed and the provider will only need to update.

MPE – Mobile Protocol Environment: A specific location where mobile devices can have detrimental effects on society.

ESP – Environment Specific Protocol: A uniquely designed code of behavior for a mobile protocol environment.

RTS – Regulatory (look-up) Table of State Laws for Mobile Protocols: Comprehensive listing of mobile device state laws, regulations, rules, policies and procedures. (controlled by provider)

PTD – Protocol Trigger Device: A unique (1-10m limited range) sensor capable of broadcasting an environment specific trigger signal.

APTD – Active Protocol Trigger Device: A protocol trigger device that is turned on and is broadcasting an environment trigger signal.

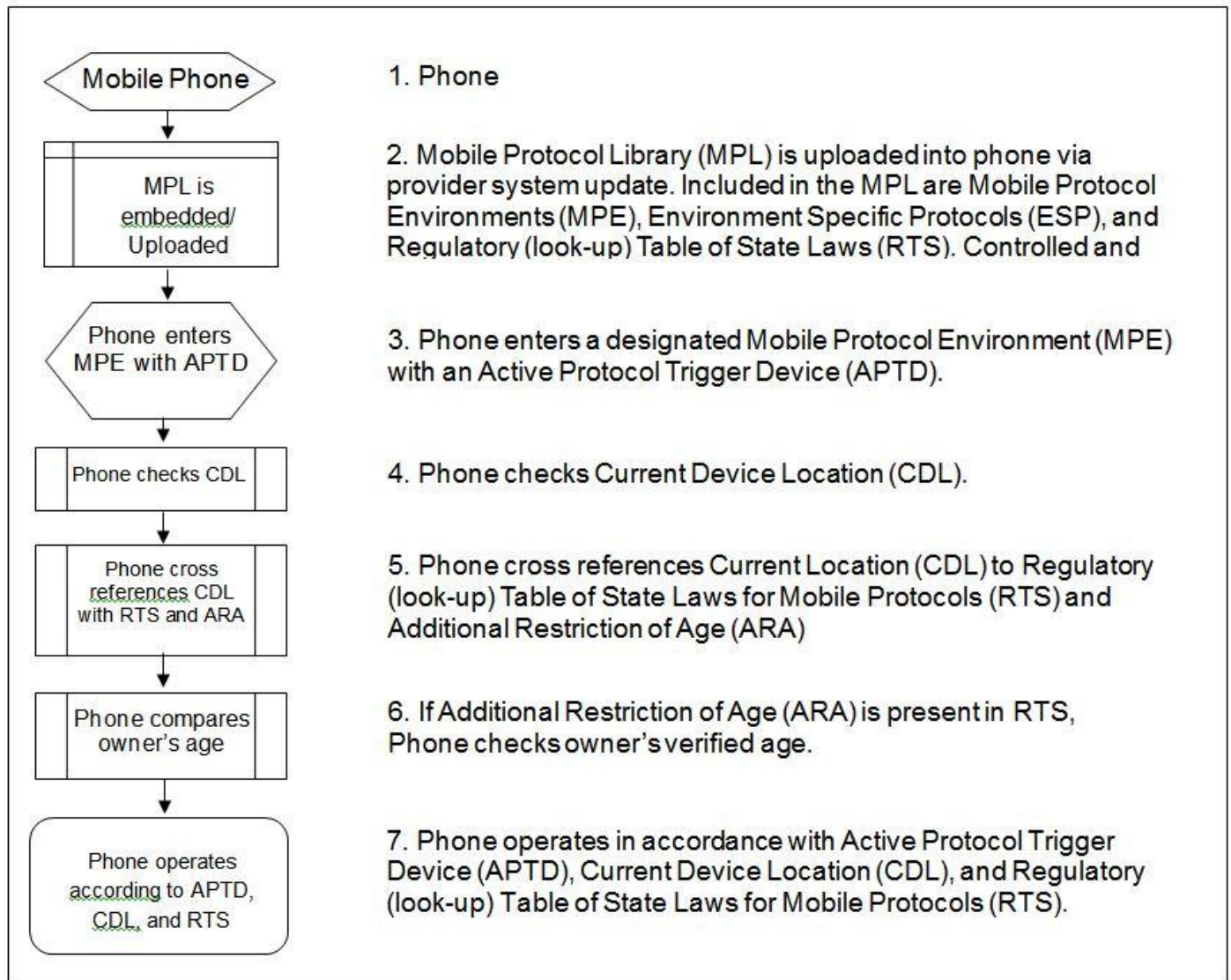
CDL – Current Device Location: The current location (city, state and zip) of a mobile device receiving a signal from an APTD.

MDPSB – Mobile Device Protocol Safety Bill: A bill requiring all mobile devices to include Automated Protocol Intelligence thereby creating a new standard in the wireless industry for complete compliance.

AUTOMATED PROTOCOL INTELLIGENCE (API)

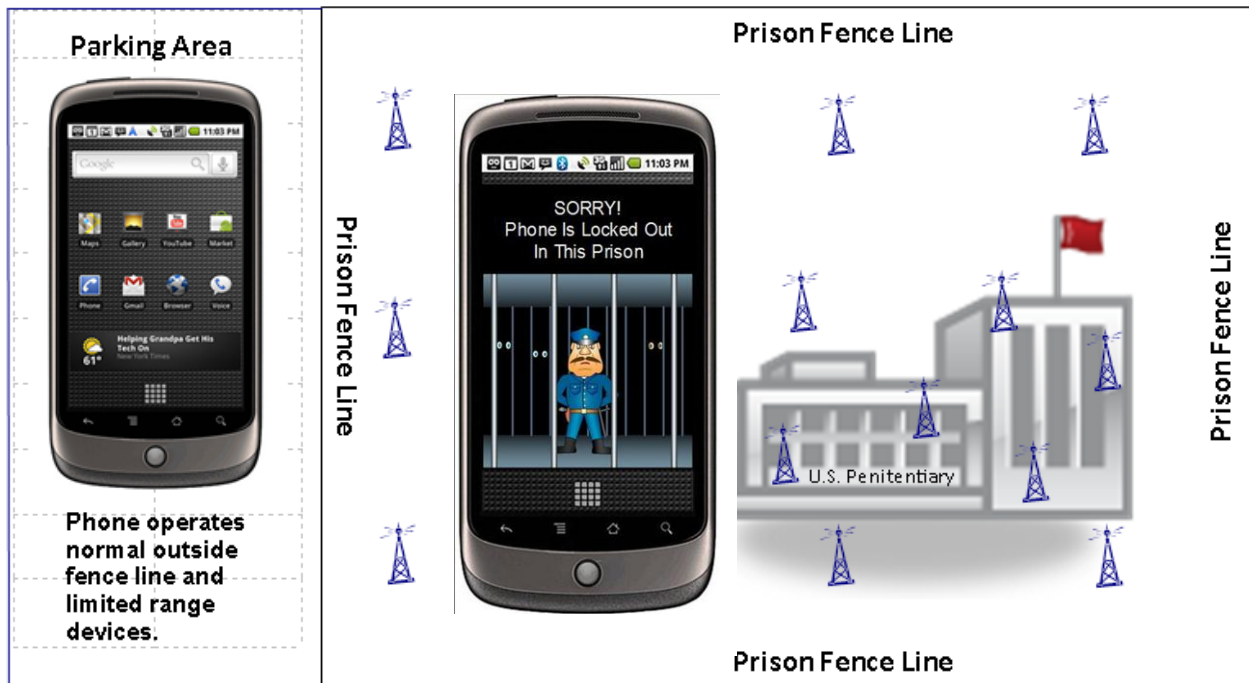
Phone Understands Environment & Location & Functions According To State Law

FLOWCHART



AUTOMATED PROTOCOL INTELLIGENCE (API)

Prison Example



Limited range Protocol Trigger Devices (PTD's) are strategically placed inside the prison fences and buildings to broadcast the prison protocol trigger signal. All phones housing environment specific protocols (ESP's) will operate according to state law once inside prison fence line and in range of the broadcast trigger signal. (PTD's can be programmed 1 - 10 m)

Business Model: Try Safety First has developed a proprietary business model strongly favoring the carriers. It will not be shown here in its entirety. However, if followed according to plan all federal and state penal institutions plus all public transportation systems will be outfitted FREE OF CHARGE (based on a suggested \$1 protocol fee charged to each carrier customer twice a year – carrier receives 50% - TSF receives 50%). Plus TSF will license carrier specified OEM's for Protocol Trigger Device development to be controlled by carrier.

Concluding remarks: While it is completely agreed that it is of paramount importance to preserve the availability and the openness of wireless communication networks, it is equally imperative to preserve the safety and welfare of our communities as a whole.

Until recently, it appeared many mobile device problems may never find a real solution. But new technology advancements engineered to work in tandem with TSF Automated Protocol Intelligence has made it possible to finally put an end to these deadly disasters.

For more information on TSF Automated Protocol Intelligence, please contact John Fischer at (770) 652-4517 or by email at john.fischer@trysafetyfirst.com.